

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO. 17-35044-H2-7
	§	
ROBERT DAVIS	§	
	§	
DEBTOR	§	

GRACE DAVIS' RESPONSE TO SHOW CAUSE MOTION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

Grace Davis, Respondent in the above case, files this response to Robert Davis' motion to show cause:

1. With respect to Debtor's Summary of Facts, Respondent denies the allegation that "[t]he Debtor paid nearly \$9,000.00 toward monthly loan modification trial payments that Wilds and Davis kept for themselves and never forwarded to Ocwen. With respect to specific allegations against Gwendolyn Wilds, Respondent has no basis to admit or deny those allegations.

2. With respect to Debtor's Facts allegations, Respondent denies the allegations in paragraph numbers 1 and 2.

3. Respondent admits the allegations in paragraph numbers 3 and 4.

4. With respect to specific allegations against Gwendolyn Wilds in paragraph 5, Respondent has no basis to admit or deny those allegations.

5. Respondent denies the allegation is paragraph number 6.

6. Respondent has no basis to admit or deny the allegations in paragraph 7.

7. Respondent denies the allegation is paragraph number 8.

With respect to specific allegations against Gwendolyn Wilds, Respondent has no basis to admit or deny those allegations. With respect to her individually, Respondent admits the allegations in paragraph numbers 9, 10, 11, and 12.

8. Respondent denies the allegation is paragraph numbers 13 and 14.

9. Respondent admits the allegations in paragraph number 15.

10. With respect to the allegations in paragraph numbers 16 and 17, Respondent has no basis to admit or deny those allegations.

11. With respect to specific allegations against Gwendolyn Wilds in paragraph numbers 18 through 45, Respondent has no basis to admit or deny those allegations. Respondent denies allegations in paragraph numbers 18 through 45, as it relates to her.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that the relief requested by the Debtor is denied and Respondent is granted such other and further relief which she may be entitled.

Date: January 10, 2020.

Respectfully submitted,

/s/ Samuel L. Milledge

SAMUEL L. MILLEDGE

Attorney in Charge for Respondent

State Bar No. 14055300

2500 East T.C. Jester Blvd., Ste. 510

Houston, Texas 77008

(713) 812-1409 - Telephone

(713) 812-1418 – Telecopier

Email: Milledge@milledgelawfirm.com;

blopez@milledgelawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was sent via court's electronic filing system to all parties associated with the Motion To Show Cause on this 10th day of January 2020.

Respectfully submitted,

/s/ Samuel L. Milledge

SAMUEL L. MILLEDGE

Attorney in Charge for Respondent

State Bar No. 14055300

2500 East T.C. Jester Blvd., Ste. 510

Houston, Texas 77008

(713) 812-1409 - Telephone

(713) 812-1418 – Telecopier

Email: Milledge@milledgelawfirm.com;

blopez@milledgelawfirm.com